

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MARK BOWLING	:	CIVIL ACTION
	:	
Plaintiff	:	
v.	:	NO. 2:21-CV-125
	:	
CREDIT CORP SOLUTIONS, INC.	:	
	:	
Defendant	:	JURY TRIAL DEMANDED
	:	

**NOTICE OF REMOVAL**

Defendant CREDIT CORP SOLUTIONS, INC. (“Defendant”), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. Defendant is a defendant in an action pending in the Court of Common Pleas of Allegheny County, Pennsylvania, No. AR-20-005216 entitled Mark Bowling v. Credit Corp Solutions, Inc. (“the State Court Action”). A true and correct copy of the Summons and Complaint are attached hereto as Exhibit “A”.

2. Plaintiff in the State Court Action is MARK BOWLING (“Plaintiff”). See Exhibit “A”.

3. Plaintiff’s State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the

defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, Defendant may properly remove the State Court Action based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Summons and Complaint on Defendant.

WHEREFORE, Defendant CREDIT CORP SOLUTIONS, INC. prays that the State Court Action be removed from the Court of Common Pleas of Allegheny County, Pennsylvania, No. AR-20-005216 to this Court for proper and just determination.

**KAUFMAN DOLOWICH & VOLUCK, LLP**

By: /s/Richard J. Perr  
RICHARD J. PERR, ESQUIRE  
Four Penn Center  
1600 John F. Kennedy Blvd., Suite 1030  
Philadelphia, PA 19103  
Telephone: (215) 501-7002  
Facsimile: (215) 405-2973  
[rperr@kdvlaw.com](mailto:rperr@kdvlaw.com)  
Attorneys for Defendant Credit Corp Solutions,  
Inc.

Dated: January 28, 2021

**CERTIFICATE OF SERVICE**

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system and electronic mail on the following:

Emily S. Gomez-Hayes, Esquire  
Law Office of Emily Gomez, LLC  
2011 Noble Street, Suite 201  
Pittsburgh, PA 15218  
[esg@egomezlaw.com](mailto:esg@egomezlaw.com)  
Attorneys for Plaintiff

/s/ Richard J. Perr  
RICHARD J. PERR, ESQUIRE

Dated: January 28, 2021

4812-9606-0378, v. 1